

Corporate Environmental Programs General Electric Company 100 Woodlawn Avenue, Pittsfield, MA 01201

Transmitted Via U.S. Mail

April 29, 2003

Mr. Bryan Olson EPA Project Coordinator United States Environmental Protection Agency EPA New England One Congress Street, Suite 1100 Boston, MA 02114-2023

Re: GE-Pittsfield/Housatonic River Site

Hill 78 Consolidation Area (GECD210) and Plant Site 3

Groundwater Management Area (GECD340) Proposal to Decommission Monitoring Wells

Dear Mr. Olson:

As you know, the General Electric Company (GE) has been utilizing the on-plant consolidation areas (OPCAs) located at the GE facility in Pittsfield, Massachusetts to consolidate excavated materials generated during response actions at various Removal Action Areas. In addition, soils and sediments from the U.S. Environmental Protection Agency's (EPA's) 1½-Mile Reach Removal Action, as well as building demolition debris from GE's ongoing Brownfields Program, have been and are being consolidated at the OPCAs. In connection with the operation of the OPCAs, GE has been performing groundwater monitoring activities at and near the OPCAs since 1999.

The OPCA groundwater monitoring program initially involved collection and analysis of groundwater samples from 12 monitoring wells (OPCA-MW-1 through OPCA-MW-8, 78-1, 78-6, H78B-15, and NY-4) at the perimeter of the final OPCA configuration, as shown on Figure 7 of the *Detailed Work Plan for On-Plant Consolidation Areas* (Work Plan). A baseline groundwater sampling event was conducted at these wells in June 1999, and semi-annual sample collection and analysis was initiated in May 2001.

In July 2001, GE submitted a Baseline Monitoring Program Proposal for Plant Site 3 Groundwater Management Area. That proposal and a February 2002 Addendum to the Baseline Monitoring Program Proposal for Plant Site 3 Groundwater Management Area outlined the groundwater monitoring program for the Plant Site 3 Groundwater Management Area (also known as GMA 4), which encompasses the OPCAs and adjacent areas. Following EPA approval of the proposed GMA 4 baseline monitoring Proposal, the OPCA groundwater monitoring activities were merged into the broader GMA 4 groundwater monitoring program. That overall program includes semi-annual groundwater quality sampling and analysis at the 12 wells in the OPCA-related monitoring program and at 10 other monitoring wells, as well as quarterly water level measurements at those 22 wells, plus nine other wells. Since initiation of the GMA 4 baseline groundwater monitoring program, two additional wells have been added for supplemental sampling and well NY-4 was replaced by well GMA4-4 for sampling and analysis purposes.

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